

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WOLVERINE WORLD WIDE, INC.,

Plaintiff,

v.

THE AMERICAN INSURANCE COMPANY,
et. al.,

Defendants.

Case No. 1:19-cv-00010-JTN-ESC

Honorable Janet T. Neff
Mag. Judge Sally J. Berens
Special Master Paula Manderfield

ORAL ARGUMENT REQUESTED

**INSURERS' MOTION TO COMPEL PRODUCTION OF UNDERLYING LITIGATION
BUDGETS AND RELATED MATERIALS CONCERNING CLAIMED DEFENSE
COSTS**

Pursuant to F.R.C.P. 37(a)(3)(A) and (B), Insurers move for an order compelling Wolverine to produce litigation budget documents bearing directly on the reasonableness and necessity of the alleged defense costs Wolverine seeks in this matter, as well as the classification of those costs as either defense, indemnity, or business-related.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that on the 14th day of October, 2020, I served the foregoing document and this Certificate of Service to all Counsel of Record with the Clerk of the Court using the electronic court filing system, which will send notification of such filing to all Counsel of Record.

/s/ Carole D. Bos
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